

ESTTA Tracking number: **ESTTA656728**

Filing date: **02/18/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92056611
Party	Plaintiff Evergreen Media Holdings, LLC
Correspondence Address	TONY DEROSA-GRUND EVERGREEN MEDIA HOLDINGS LLC 923 HIGH MEADOW RANCH DRIVE MAGNOLIA, TX 97355 UNITED STATES tonydg@evergreenmediagroup.com
Submission	Other Motions/Papers
Filer's Name	Michael R. Patrick
Filer's e-mail	michael@pllclaw.com
Signature	/Michael R. Patrick/
Date	02/18/2015
Attachments	Motion for Extension of Time on Consent (2-18-2015).pdf(121495 bytes)

EVERGREEN MEDIA
HOLDINGS LLC,

Plaintiff,

v.

WORLD WRESTLING
ENTERTAINMENT, INC.,

Defendant.

Evergreen Media Holdings, LLC (“Plaintiff”) hereby requests an extension of time, namely of thirty (30) days, as to all current deadlines. This Motion is for good cause, namely: (i) the parties require additional time to conduct discovery, among other things, due to, in part, urgent family matters requiring the undersigned’s time and attention for the past month and for this month; and (ii) the parties are engaged in settlement discussions.

1. Plaintiff's counsel, Michael R. Patrick, has been involved in an urgent and sensitive personal medical matter involving his family for the past month that will require his time and attention for the next several weeks. Accordingly, an extension of all deadlines is warranted.

2. The parties also request additional time insofar as there are settlement discussions occurring directly between the parties. However, given various factors, including, but not limited to, weather conditions in New England, such discussions have been delayed. More specifically, counsel for the parties currently are scheduling discussions between Plaintiff (who is located in

Texas) and Defendant's in-house counsel, Lauren Dienes-Middlen (who is located in Connecticut).

It is anticipated that such discussions will occur within the next several weeks.

3. Accordingly, the parties request an extension of thirty (30) days as to all remaining deadlines and that the trial dates be reset as follows:

Initial Disclosures Due	COMPLETED
Expert Disclosures Due	3/21/2015
Discovery Closes	4/20/2015
Plaintiff's Pretrial Disclosures	6/4/2015
Plaintiff's 30-day Trial Period Ends	7/19/2015
Defendant's Pretrial Disclosures	8/3/2015
Defendant's 30-day Trial Period Ends	9/17/2015
Plaintiff's Rebuttal Disclosures	10/2/2015
Plaintiff's 15-day Rebuttal Period Ends	11/1/2015

4. The undersigned has conferred with counsel for Defendant, Christopher Verdini, who consents to the relief requested herein.

WHEREFORE, Plaintiff requests that this Motion be granted.

Dated: February 18, 2015

RESPECTFULLY SUBMITTED,

/s/ Michael R. Patrick

PATRICK LLC

One Atlantic Street, Suite 604

Stamford, Connecticut 06901

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michael@pllclaw.com

Attorney for

Evergreen Media Holdings, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address of record by facsimile or email (by agreement) on this date, February 18, 2015.

/s/ Michael R. Patrick

PATRICK LLC

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Attorney for

Evergreen Media Holdings, LLC